

**Before the  
Federal Communications Commission  
Washington, D.C. 20554**

In the Matter of	)	
	)	
The Uniendo a Puerto Rico Fund and the	)	WC Docket No. 18-143
Connect USVI Fund	)	
	)	
Connect America Fund	)	WC Docket No. 10-90
	)	
ETC Annual Reports and Certifications	)	WC Docket No. 14-58

**MOTION FOR EXTENSION OF TIME**

Pursuant to Section 1.46 of the Commission’s rules,<sup>1</sup> Puerto Rico Telephone Company, Inc. (“PRTC”) respectfully requests an extension of time to file comments and reply comments in response to the above-referenced Notice of Proposed Rulemaking, which was released on May 29, 2018 (“Puerto Rico/USVI Fund NPRM”).<sup>2</sup> PRTC proposes a 21-day extension of the deadline for filing comments and reply comments (*i.e.*, to July 26, 2018 and August 8, 2018, respectively). The instant proceeding seeks to fundamentally re-engineer the Connect America Fund program as it relates to Puerto Rico and the U.S. Virgin Islands (“USVI”). The additional time is necessary due to the complexity of the issues presented by the proposals in the *Puerto Rico/USVI Fund NPRM* at a time when affected carriers are engaged in massive post-hurricane restoration efforts.

The Commission should grant the request for two reasons. First, the *Puerto Rico/USVI Fund NPRM* raises complex issues and due care is necessary in ensuring that an adequate record

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<sup>1</sup> 47 C.F.R. § 1.46.

<sup>2</sup> *The Uniendo a Puerto Rico Fund and the Connect USVI Fund, Connect America Fund, ETC Annual Reports and Certifications*, WC Docket Nos. 18-143, 10-90 and 14-58, Order and Notice of Proposed Rulemaking, FCC 18-57 (rel. May 29, 2018) (“*Puerto Rico/USVI Fund Order*” and “*Puerto Rico/USVI Fund NPRM*,” as appropriate). The *Puerto Rico/USVI Fund NPRM* was published in the Federal Register on June 13, 2018. *See* The Uniendo a Puerto Rico Fund and the Connect USVI Fund, Connect America Fund, ETC Annual Reports and Certifications, 83 Fed. Reg. 27,528 (June 13, 2018).

is established on all issues raised. Specifically, the Commission proposes to eliminate the existing frozen high-cost support mechanism and replace it with the Uniendo a Puerto Rico Fund and the Connect USVI Fund, which would distribute high-cost support through a competitive mechanism.<sup>3</sup> Unlike other proceedings in which particular proposals have been under consideration for a considerable period, this is the first time the Commission proposes to create a dedicated fund for Puerto Rico and the USVI. The *Puerto Rico/USVI Fund NPRM* raises numerous and complex issues including, but not limited to, budget, provider eligibility, service area designations, the scope of locations to be served in each geographic area, and reserve prices. Carriers must evaluate these proposals in light of a multitude of business, engineering and financial considerations, some of which require specialized expertise. In fact, PRTC has engaged outside financial modeling experts to ensure that PRTC will offer meaningful recommendations to the Commission. A reasonable extension would allow the parties additional time to study and address these issues.<sup>4</sup>

Second, a reasonable extension of the pleading cycle is appropriate due to the fact that PRTC and other carriers in the territories are focusing their resources on rebuilding and restoration. As the Commission notes in the *Puerto Rico/USVI Fund NPRM*, hurricanes Irma and Maria caused widespread devastation to Puerto Rico and the USVI, destroying thousands of homes and causing near total destruction of critical infrastructure.<sup>5</sup> PRTC experienced catastrophic damage to its central offices, remote central offices, and cell sites throughout the island.<sup>6</sup> The company is devoting significant resources to rebuild its network and restore service to customers, which is

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<sup>3</sup> *Puerto Rico/USVI Fund NPRM* at ¶ 36.

<sup>4</sup> This request does not seek to alter deadline for the submission of a certification regarding the number of subscribers served as of June 30, 2017 to the Commission within 14 days of the publication of the *Puerto Rico/USVI Fund Order* in the Federal Register. Providing this data will not be as time consuming as the preparation of comments on the *Puerto Rico/USVI Fund NPRM*.

<sup>5</sup> *Puerto Rico/USVI Fund NPRM* at ¶ 1.

<sup>6</sup> See Comments of Puerto Rico Telephone Company, Inc., PS Docket No. 17-344 (Jan. 22, 2018).

extremely challenging due to numerous issues, including ongoing and chronic electrical power outages in Puerto Rico. PRTC is also preparing for the current hurricane season, which began on June 1, 2018. These efforts, in addition to the resources needed for the day-to-day operations, are very demanding on the company's resources.

PRTC recognizes that the Commission does not routinely grant requests to extend filing deadlines. At the same time, the Commission has previously determined that extensions are warranted when the extension is necessary to ensure that the Commission receives full and informed responses and that affected parties have a meaningful opportunity to develop a more complete record for the Commission's consideration.<sup>7</sup> Consistent with these precedents, a limited

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<sup>7</sup> See, e.g., *Petition of USTelecom for Forbearance Pursuant to 47 U.S.C. § 160(c) to Accelerate Investment in Broadband and Next-Generation Networks*, WC Docket No. 18-141, Order, DA 18-574, ¶ 3 (WCB 2018) (extending the comment deadline by 60 days and the reply comment deadline by 15 days to provide interested parties additional time to review and respond to the complex issues and questions raised in the Petition); *Bridging the Digital Divide for Low-Income Consumers*, WC Docket No. 17-287, Order, 33 FCC Rcd 214, ¶ 3 (WCB 2018) (extending the comment and reply comment deadlines by four weeks to ensure all parties have adequate time to review and respond to the issues and questions raised in the 2017 Lifeline NPRM and NOI); *Streamlining Deployment of Small Cell Infrastructure by Improving Wireless Facilities Siting Policies*, WT Docket No. 16-421, Order, 32 FCC Rcd 335, ¶ 3 (WTB 2017) (granting 30-day extension of comment and reply comments deadlines to allow the parties to provide the Commission with more thorough comments that will facilitate the compilation of a complete record); *Comment Period Extended for Further Notice of Proposed Rulemaking on Network Non-Duplication and Syndicated Exclusivity Rules*, Public Notice, 29 FCC Rcd 3925, ¶ 1 (MB 2014) (extending the comment and reply comment deadlines by 45 days to facilitate the development of a full record); *Facilitating the Deployment of Text-to-911 and Other Next Generation 911 Applications*, PS Docket No. 11-153, Order, 26 FCC Rcd 16941, ¶ 4 (PSHSB 2011) (granting a 30-day extension of the reply comment deadline to allow parties a meaningful time to review, analyze and comment on the record); *Empowering Consumers to Avoid Bill Shock*, CG Docket No. 10-207, Order, 25 FCC Rcd 17405, ¶ 3 (CGB 2010) (recognizing that “the Commission has previously found that an extension of time is warranted when such an extension is necessary to ensure that the Commission receives full and informed responses and that affected parties have a meaningful opportunity to develop a complete record for the Commission's consideration”); *Wireless E911 Location Accuracy Requirements*, PS Docket No. 07-114, Order, DA 10-2267, ¶ 3 (PSHSB 2010) (granting an extension “to ensure that all interested parties have the time necessary to prepare full and informed comments and reply comments”); *Twenty-One Day Extension of Time to File Reply Comments on Wireless Innovation and Investment Notice of Inquiry*, Public Notice, 24 FCC Rcd 12579, 12579-80 (WTB & OET 2009) (finding that a 21-day extension of time for reply comments “would be beneficial to the development of a complete record on the issues”); *Media Bureau Grants Extension of Time to File Comments and Reply Comments in Response to Broadcast Localism Notice of Proposed Rulemaking*, Public Notice, 23 FCC Rcd 3741, 3742 (MB 2008) (finding that an extension of the comment and reply comment period was warranted to enable commenters to adequately review, investigate, and comment on the specific issues raised in the Notice of Proposed Rulemaking); *Service Rules for Advanced Wireless Services in the 2155-2175 MHz Band, Service Rules for Advanced Wireless Services in the 1915-1920 MHz, 1995-2000 MHz, 2020-2025 MHz and 2175-2180 MHz Bands*, Order, 23 FCC Rcd 10527, ¶ 4 (WTB 2008) (granting a 30-day extension of comment deadline “to allow for additional discussion of the proposal” in the Further Notice); *Elimination of Rate-of-Return Regulation of Incumbent Local Exchange Carriers, Federal-State Joint Board on Universal Service*, CC Docket No. 96-45, Order, 18 FCC

21-day extension of the comment and reply comment deadlines is appropriate in this case. The extension will not only allow the affected carriers and the public a meaningful period of time to review and analyze the Commission's proposals, but also engage outside consultants to prepare complete and robust submissions providing a solid foundation for Commission decision making in its efforts to promote the recovery and strengthening of communications networks in the territories. Furthermore, an extension will not cause undue delay to the Commission's consideration of the issues in the proceeding or prejudice to any party.

For the foregoing reasons, PRTC requests that the Commission grant this request for an extension of comment and reply deadlines in the above-captioned proceeding.

Respectfully submitted,

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Rcd 26307, ¶ 2 (TAPD 2003) (granting comment extension deadline to permit more full and informed responses and help the parties develop a better record for the Commission's decision).